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Counsel for Defendant  
JOSE FARIAS BARAJAS

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

UNITED STATES OF AMERICA,	)	No. CR-12-00723 EJD
	)	
Plaintiff,	)	<b>STIPULATION TO CONTINUE</b>
	)	<b>SENTENCING HEARING; [PROPOSED]</b>
vs.	)	<b>ORDER AS MODIFIED</b>
	)	
JOSE FARIAS BARAJAS,	)	
	)	
Defendant.	)	
_____	)	

Defendant Jose Farias Barajas, by and through Assistant Federal Public Defender Robert Carlin, and the United States, by and through Assistant United States Attorney Stephen Meyer, hereby stipulate and agree, subject to the Court's approval, that the sentencing hearing currently set for Thursday, March 26, 2015 be continued to Thursday, May 28, 2015. In addition, the parties request that the amended Presentence Report ("PSR") be due on April 28, 2015.

The parties and Probation have been waiting for a report and evaluation of Mr. Farias Barajas by cognitive and forensic psychologist Timothy Darning. Dr. Darning completed his report on Friday, March 13, 2015, and it was circulated to Probation and the government the

1 same day. United States Probation Officer Insa Bel'Ochi ("USPO Bel'Ochi") indicated that she  
2 will require approximately six weeks to prepare an amended PSR incorporating the information  
3 from Dr. Darning's evaluation. The government would also like time to review Dr. Darning's  
4 report and make a determination whether it wishes to retain and consult its own expert.

5 The parties have consulted with USPO Bel'Ochi and she has advised that the proposed  
6 dates are acceptable.

7 For the reasons set forth above, it is respectfully requested that the sentencing hearing  
8 currently set for Thursday, March 26, 2015, be continued to Thursday, May 28, 2015, and that a  
9 deadline of April 28, 2015, be set for production of an amended PSR.

10 IT IS SO STIPULATED.

11 Date: March 17, 2015

12  
13 \_\_\_\_\_/s/  
14 ROBERT CARLIN  
Assistant Federal Public Defender

15 Date: March 17, 2015

16  
17 \_\_\_\_\_/s/  
18 STEPHEN MEYER  
Assistant United States Attorney

~~[PROPOSED]~~ **ORDER AS MODIFIED**

GOOD CAUSE APPEARING, upon stipulation of the parties, IT IS HEREBY ORDERED that the sentencing hearing for Jose Farias Barajas, which is currently set for Thursday, March 26, 2015, shall be continued to Thursday, May 28, 2015, at 2:30 p.m.

IT IS FURTHER ORDERED that the amended Presentence Report shall be produced by Probation no later than April 28, 2015.

IT IS SO ORDERED.

Date: March 18, 2015

  
HON. EDWARD J. DAVILA  
United States District Court Judge